

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM FEDERAL CREDIT
UNION, on behalf of itself and its members,**

Plaintiff,

vs.

Case No. 2:19-cv-00624-RJC

**FISERV SOLUTIONS, LLC, f/k/a FISERV
SOLUTIONS, INC., and FISERV, INC.,**

Defendants.

[PROPOSED] AMENDED CASE MANAGEMENT ORDER

IT IS HEREBY ORDERED that this action is placed under Local Rule 16.1 for pretrial proceedings and all provisions of the Rule will be strictly enforced. Pursuant to Local Rule 16.1, the parties are directed as follows:

1. The parties shall complete fact discovery by **June 12, 2023**. All interrogatories, depositions and requests for admissions and/or production of documents shall be served within sufficient time to allow responses to be completed prior to the close of fact discovery.
2. Plaintiff's Expert Reports are due on or before **July 13, 2023**. Defendant's Expert Reports are due on or before **September 12, 2023**. Depositions of all experts shall be on or before **October 27, 2023**.
3. The Court has appointed a Special Master to handle all discovery disputes in the manner set forth in the Order Referring Case to Special Master for Discovery. (ECF No. 195).
4. If a discovery dispute occurs, the parties will comply with the procedures set forth in the Order Referring Case to Special Master.

5. The parties have elected to have the Court separately enter the Model Order located in the Appendix to LCvR 16.1.D relating to the protections of Federal Rule of Evidence 502(d).

6. The Court will conduct a post-discovery status conference on _____, 2023 at _____ in the Chambers of United States District Judge Robert J. Colville, Suite 6220 U.S. Post Office and Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania. Lead trial counsel shall attend, and the court will inform counsel if attendance by the parties is necessary.

7. The parties shall file a Joint Pre-Conference Statement by _____.

IT IS FURTHER ORDERED that counsel shall confer with their clients prior to all case management, status or pretrial conferences to obtain authority to participate in settlement negotiations to be conducted by the Court. Counsel are encouraged to instruct the principals to be available by telephone to facilitate the amicable resolution of all litigation.

Dated this _____ day of _____, _____.

BY THE COURT:

Hon. Robert J. Colville, District Judge